

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

October 14, 2021

Via ECF

The Honorable Edgardo Ramos
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC # _____
DATE FILED: 10/15/2021

MEMO ENDORSED

Re: *United States v. Pedro Nunez*, 21 CR 612 (ER)

Dear Judge Ramos:

With the consent of the government, I write to seek a modification to the conditions of Mr. Nunez's release so that he can reside in Philadelphia, Pennsylvania and that his travel restrictions include Pennsylvania, as well.

Mr. Nunez was presented on September 8, 2021 at which time Magistrate Judge Cave set bail conditions, including a condition that Mr. Nunez live in New York and a condition restricting his travel to the Southern and Eastern Districts of New York. Following his release on those bail conditions, Mr. Nunez was extradited to Philadelphia, Pennsylvania on a warrant related to a criminal matter. Yesterday, he was released in Philadelphia on bail on that matter. Most of his closest family lives in Philadelphia, including his mother. Because he will need to appear frequently in person on his Philadelphia case and because he has stable support in that community, we ask that his bail conditions be modified to allow him to live and travel in Pennsylvania. I have spoken with Pretrial Services who can transfer Mr. Nunez's supervision to Philadelphia if this application is granted. The government consents to this application.

Respectfully submitted,

/s/ Julia Gatto

Julia L. Gatto, Esq.
212.417.8750

cc: AUSA Kedar Bhatia (via ECF)

The application is X granted
____ denied


Edgardo Ramos, U.S.D.J
Dated: 10/15/2021
New York, New York